

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of

THE COMMONWEALTH OF PUERTO RICO, et
al.,

Debtor¹

PROMESA Title III

No. 17 BK 3283-LTS
(Jointly Administered)

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of

PUERTO RICO ELECTRIC POWER
AUTHORITY (“PREPA”)

Debtor

PROMESA Title III

No. 17 BK-4780-LTS

VERIFIED STATEMENT PURSUANT TO RULE 2019

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) made applicable to these Title III cases by section 310 of the Puerto Rico Oversight, Management and Economic Stability Act of 2016 (“PROMESA”),² Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica (“SREAEE”), Unión de Trabajadores de la

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780 (LTS)) (Last Four Digits of Federal Tax ID: 9686). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² References to PROMESA are references to 48 U.S.C. §§ 2101 et. seq.

Industria Eléctrica y Riego (“UTIER”), and Asociación de Profesoras y Profesores del Recinto Universitario de Mayagüez (“APRUM”), by and through their undersigned counsels, hereby submit this verified statement (the “Verified Statement”), and respectfully state as follows:

1. On or around June 27, 2017, APRUM retained Bufete Emmanuelli, C.S.P. (“Bufete Emmanuelli”) as its legal counsels.

2. On or around July 6, 2017, UTIER retained Bufete Emmanuelli.

3. On or around January 22, 2018, SREAEE retained Bufete Emmanuelli.

4. APRUM is not a creditor or equity holder against any of the Title III Debtors.

5. SREAEE and UTIER hold claims against PREPA arising from labor claims and pension fund related claims.

6. In accordance with Bankruptcy Rule 2019, attached hereto as Exhibit A is a list of the names and addresses of, and the nature and amount of all disclosable economic interests held by SREAEE and UTIER in relation to the Debtors as of the Formation Date (unless otherwise indicated). The claims and claim amounts set forth on Exhibit A have been provided by SREAEE and UTIER.

7. Neither SREAEE, APRUM nor UTIER hold bonds issued by the Commonwealth or its instrumentalities.

8. By filing this Verified Statement, SREAEE and UTIER make no representation regarding the amount, allowance or priority of such claims and reserves all rights with respect thereto.

9. Nothing contained in this Statement (or Exhibit A hereto) should be construed as a limitation upon, or waiver of, any rights of SREAEE or UTIER to assert, file, and/or amend any

claim or proof of claim filed in accordance with applicable law and any orders entered in these cases.

10. Counsel reserves the right to amend this Statement as necessary in accordance with the requirements set forth in Bankruptcy Rule 2019.

RESPECTFULLY SUBMITTED.

In Ponce, Puerto Rico, this 12th day of March, 2018.

I HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and Standard Parties. Paper copies have been mailed pursuant to Section II of the *Third Amended Notice, Case Management and Administrative Procedures* (Docket No. 1512-1):

- (i) Chambers of the Honorable Laura Taylor Swain (two copies shall be delivered to the chambers):
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Suite No. 3212
New York, New York 10007-1312;
- (ii) Office of the United States Trustee for Region 21
Edificio Ochoa, 500 Tanca Street, Suite 301
San Juan, PR 00901-1922

Bufete
Emmanuelli C.S.P.

/s/Rolando Emmanuelli Jiménez
USDC: 214105

/s/Yasmín Colón Colón
USDC: 230814

/s/Jessica E. Méndez Colberg

USDC: 302108

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Exhibit A

Name of Creditor	Address	Nature and Amount of Disclosable Economic Interest
Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica	PO Box 13978, San Juan, PR 00908-3978	SREAEE holds Pension Fund related claims.
Unión de Trabajadores de la Industria Eléctrica y Riego	PO Box 13068 San Juan, Puerto Rico 00908-3068.	UTIER holds contingent and non-contingent claims, currently liquidated and not liquidated against PREPA based on (1) pay, benefits and other terms of employment owed to UTIER members under collective bargaining agreements with PREPA, including, but not limited to, (a) pay, benefits and other terms of employment claimed or owed in pre-petition union grievances and arbitrations proceedings and (b) pay, benefits and other terms of employment denied to employees as a result of pre-petition legislative, executive or other unilateral action by the Commonwealth and PREPA.